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Attorney for Plaintiff
 SINCO TECHNOLOGIES PTE LTD

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SINCO TECHNOLOGIES PTE LTD,

Plaintiff,

v.

SINCO ELECTRONICS (DONGGUAN) CO.,
 LTD.; XINGKE ELECTRONICS
 (DONGGUAN) CO., LTD.; XINGKE
 ELECTRONICS TECHNOLOGY CO., LTD.;
 SINCOO ELECTRONICS TECHNOLOGY
 CO., LTD.; MUI LIANG TJOA (an
 individual); NG CHER YONG aka CY NG (an
 individual); and LIEW YEW SOON aka
 MARK LIEW (an individual),

Defendants.

Case No. 3:17CV5517

**PLAINTIFF SINCO TECHNOLOGIES
 PTE LTD'S NOTICE OF MOTION
 AND MOTION FOR DEFAULT
 JUDGMENT**

[Fed. Rules Civ. Proc. § 55(b)(2)]

Date: TBD
 Time: TBD
 Judge: Edward M. Chen

Trial Date: 11/01/2021
 Date Action Filed: 9/22/2017

TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that at a date and time to be set by the Court, located at 450 Golden Gate Avenue, San Francisco, California 94102, in Courtroom 5 located on the 17th Floor, before the Honorable Judge Edward M. Chen, Plaintiff, SINCO TECHNOLOGIES PTE LTD, ("SINCO" or "Plaintiff" or "SinCo") by and through its Attorneys of record, will and hereby does respectfully move for an Order granting default judgment against Defendant SINCOO ELECTRONICS TECHNOLOGY CO., LTD. ("SINCOO") for damages arising from the claims stated in Plaintiff's complaint in this action (ECF Dkt. No. 23), in the amount of \$200,000 per

each SINCO trademark pursuant to 15 U.S.C. §1117. SINCO has four registered trademarks with the United States Trademark and Patent Office. These marks include U.S. Trademark Registrations Nos. 3,188,537; 4,524,165; 4,524,172; and 4,524,173. SINCO also requests that this Court issue a permanent injunction against Defendant SINCOO to cease present and future use of the “SinCo” and “SinCoo” (or “Sincoo”) marks.

The clerk of the Court has previously entered defaults against SINCOO on **December 17, 2018**. (ECF Dkt. No. 110.) This Motion is made pursuant to FRCP, section 55 on its claim for trademark infringement in violation of the Lanham Act, 15 U.S.C. § 1114.

At the time and place of hearing, Plaintiff will present proof of the following matters:

1. On **February 23, 2017**, Plaintiff filed a Complaint against Defendant SINCOO for Trademark Infringement (ECF Dkt. No. 23.)
2. On **April 25, 2018**, SINCO sent SINCOO the Summons, First Amended Complaint with Exhibits A through R, and Chinese translations thereof, with two copies of Waiver of Service of Summons and a Notice and Request to Waive Service of Summons by FedEx. (ECF Dkt. No. 104 at p.2).
3. SINCOO is not an infant, incompetent, in military service or otherwise exempted from default judgment under the Service Members Civil Relief Act. Defendant SINCOO is a Chinese company showing that they are neither a minor nor an incompetent person. Thereby, this requirement has been met by SINCO in its request for entry of default. (ECF Dkt. No.104.)
4. SINCOO have not participated in this action following their defaults.
5. Plaintiff is entitled to judgment against SINCOO on account of the claims in Plaintiff’s complaint for Trademark Infringement (ECF Dkt. No. 23.)
6. The amount of judgment sought is the sum of \$800,000 pursuant to 15 U.S.C. §1117, in the amount of \$200,000 per each SINCO trademark.

The Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities in support thereof, the accompanying Declaration of Lael D. Andara in support thereof, the pleadings on file with the Court in this action, and on such

1 further oral argument and documentary evidence, as may be presented at the hearing of this
2 motion.

3 Dated: December 1, 2021

Respectfully submitted,

4 ROPERS MAJESKI PC

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6 By: /s/ Lael D. Andara

7 LAEL D. ANDARA

Attorney for Plaintiff

8 SINCO TECHNOLOGIES PTE LTD